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Via ECF

Honorable Margaret M. Garnett United States District Court Southern District of New York 40 Foley Square, Room 2102 New York, NY 10007

November 14, 2024

RE: Propetrol Limited v. QMF Energy DMCC, 1:24-cv-00330-MMG Letter-Motion for Adjournment and Extension of Time

Dear Judge Garnett:

We write jointly on behalf of Plaintiff Propetrol and Defendant QMF Marine, Ltd. in response to the Court's inquiry regarding the status of pre-motion letters for summary judgment.

The parties acknowledge that we have missed the deadlines for both individual pre-motion letters (November 1) and the joint letter (November 8). This occurred as the parties have been actively engaged in settlement discussions, including direct communications between principals, which have shown promising progress toward resolution.

While we had intended to request an extension of these deadlines, we failed to do so in a timely manner, and we apologize to the Court for this oversight. The parties are in agreement that:

- 1. Fact discovery remains incomplete, primarily due to ongoing settlement discussions;
- 2. Both parties believe that a negotiated resolution remains possible and would be in the interests of judicial economy;
- The parties jointly request a brief extension of all current deadlines, including those for the pre-motion letters and the upcoming November 19 conference, to allow us to focus on finalizing settlement discussions.

Should the Court be amenable, we propose:

- Extending the deadline for individual pre-motion letters to January 15, 2025
- Extending the deadline for the joint letter to January 22, 2025
- Adjourning the November 19 conference to a date convenient for the Court in February 2025

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We propose these dates recognizing that the upcoming holiday season may impact the parties' ability to complete necessary work, and to ensure sufficient time for meaningful settlement discussions.

We understand that this request comes late, and we appreciate the Court's consideration. Should the Court prefer to maintain the November 19 conference, counsel for both parties are prepared to proceed either in person or via Zoom to address any questions the Court may have.

Respectfully submitted,

Watson Farley & Williams LLP Attorneys for Petitioner

<u>/s/ John Kissane</u> John Kissane

Blank Rome LLP Attorneys for Respondent

/s/ Richard V. Singleton Richard V. Singleton

Application GRANTED. It is hereby ORDERED that the November 19, 2024 post-fact discovery conference shall be ADJOURNED to February 18, 2025 at 9:30 a.m. in Courtroom 906 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, NY 10007. Pre-motion letters regarding summary judgment shall be due no later than January 29, 2025. Responses or oppositions to pre-motion letters shall be due no later than February 5, 2025. Should no party file a pre-motion letter, the parties' joint letter shall be due no later than February 5, 2025. Counsel is advised that should the parties reach a settlement in principle prior to the aforementioned dates, they should inform the Court as soon as practicable via a letter filed on ECF. Counsel is further advised that, in accordance with the Court's Individual Rules & Practices, requests for extensions of time must be made at least two days before the relevant deadline. Future untimely requests may be denied on that basis alone.

The Clerk of Court is respectfully directed to terminate Dkt. No. 30.

SO ORDERED. Dated November 15, 2024

HON. MAROARET M. GARNETT UNITED STATES DISTICT JUDGE